

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

UNITED STATES OF AMERICA,)
v.)
Plaintiff,)
)
MARCO ANTONIO DELGADO,)
Defendant.)
)
)
)
CRIMINAL NO. EP-13-CR-0370-DCG

JOINT ADMISSIBILITY OF EXHIBITS

The United States, by and through the United States Attorney for the Western District of Texas, and the undersigned Assistant United States Attorneys, and Defendant Marco Delgado, by and through his attorneys Maureen Scott Franco, Federal Public Defender, and Erik Anthony Hanshew, Assistant Federal Public Defender, respectfully submit the parties' Joint Exhibit List.

The Defendant does not oppose the introduction of certified domestic records of regularly conducted activity accompanied by a self-proving affidavit, pursuant to Fed. R. Evid. 902(11). The Defendant opposes the introduction of certain foreign records received pursuant to Mutual Legal Assistance Treaties (MLATs). The Defendant does not oppose the admissibility of the remaining exhibits on the condition that the documents are properly authenticated pursuant to Fed. R. Evid. 901 or 902.

GOVERNMENT'S PROPOSED EXHIBIT LIST

Number	Exhibit	Admitted	Witness
1	Turks & Caicos Account records (from MLAT)		
2	SUMMARY CHART - Turks & Caicos Account records		

Number	Exhibit	Admitted	Witness
3	Articles of Incorporation for FGG Enterprises, LLC (April 3, 2009)		
4	Special Power of Attorney by Gireud to Delgado, July 13, 2009		
5	EMAIL 6/10/2009 Delgado to Williams, copying Ponce, re: "FGG Bid Package"		
6	EMAIL 7/30/2009 Delgado to Ponce, re: "Apostilles and Power of Attorney"		
7	Teaming Agreement between MPSA and FGG, dated 8/8/2009, with Amendment		
8	Memorandum of Understanding between FGG and Delgado & Associates, 9/16/2009		
9	FGG's Bid for Agua Prieta II Project, Economic Proposal, 10/20/2009		
9A	Translation of Exhibit 9		
10	EMAIL 11/20/2009 Delgado to Ponce, re: "Letter of Credit"		
11	EMAIL 11/27/2009 Adams to Gireud, re: "Agua Prieta Award Letter"		
12	Subcontract for Acquisition of Goods between FGG and MPSA, 12/16/2009		
12A	Translation of Exhibit 12		
13	EMAIL 12/24/2009 Delgado to Ponce, re: "CFE Equipment Contract"		
14	EMAIL 12/28/2009 Ponce to Gireud, copying Delgado, re: "FGG Concerns Adams Letter 091228.pdf"		
15	EMAIL 12/30/2009 Delgado to Gireud and Miller, re: "Adams draft ltr"		
16	EMAIL 12/31/2009 Gireud to Ponce, re: "Agua Prieta Project," with attachments		
17	EMAIL 12/31/2009 Delgado to Ponce, re: "Agua Prieta Project"		

Number	Exhibit	Admitted	Witness
18	Contract for Acquisition of Goods between FGG, Banco Nacional, and Fideicomiso, with appearance of CFE, 1/6/2010, pages 1-21 (from MLAT)		
18A	Translation of Exhibit 18		
19	Attachment S to Contract for Acquisition of Goods (from MLAT)		
19A	Translation of Exhibit 19		
20	Attachment T to Contract for Acquisition of Goods (from MLAT)		
20A	Translation of Exhibit 20		
21	Two-paragraph Letter, 1/10/2010, re: Pledge (from MLAT)		
22	Three-paragraph Letter, 1/10/2010, re: Pledge		
23	John Adams passport		
24	John Adams crossing records		
25	IACE travel records		
26	MPSA expense records		
27	T-Mobile Records for John Adams' MPSA phone, Dec. 2009		
28	T-Mobile Records for John Adams' MPSA phone, Jan. 2010		
29	Irais Davila's notary book (Book 1)		
30	Irais Davila's notary book (Book 2)		
31	LETTER 5/20/2012 Ramos to FGG, Att'n Delgado		
31A	Translation of Exhibit 31		
32	Contract for Pledge Without Transfer of Possession, 1/15/2010 (from MLAT)		
32A	Translation of Exhibit 32		
33	Power of Attorney, 1/11/2010		

Number	Exhibit	Admitted	Witness
34	EMAIL 1/12/2010 Ponce to Gireud, copying Delgado, re: "FGG Clarifications Letter 100112.pdf"		
35	EMAIL 1/12/2010 Delgado to Miller, forwarding 1/12/2010 letter from Adams		
36	EMAIL 1/12/2010 Delgado to Gireud, re: "Itinerary ing buendia.docx"		
36A	Translation of Exhibit 36		
37	EMAIL 1/18/2010 Ponce to Gireud, copying Delgado, re: "FGG Clarifications Letter 100112.pdf"		
38	EMAIL 1/24/2010 Ponce to Gireud and Delgado, re: "CFE-FGG Equipment Sales Contract"		
39	ANEXO W		
40	EMAIL 2/11/2010 Gireud to Ponce, copying Delgado, re: "JA response letter," with attachment		
40A	Translation of Exhibit 40		
41	EMAIL 2/12/2010 Beddard to Gireud, re: "AGUA-FGG/MPSA Payment Schedule Invoice Submittal Notification"		
42	EMAIL 3/2/2010 Gireud to Ponce, copying Delgado, re: "Request for Assignment of Collection"		
43	LETTER 3/3/2010 Delgado to Ramos (CFE), for funds to be paid to Turks & Caicos Account (from MLAT)		
43A	Translation of Exhibit 43		
44	EMAIL 3/3/2010 Ueki to Gireud, re: "Agua Prieta," with attachment		
45	EMAIL 3/8/2010 Delgado to Miller, Gireud, Ponce, re: "Request for Assignment of Collection Rights"		
45A	Translation of Exhibit 45		
46	TRANSMISSION 3/8/2010, \$20 million transferred to Turks & Caicos Account (from MLAT)		

Number	Exhibit	Admitted	Witness
46A	Translation of Exhibit 46		
47	EMAIL 3/12/2010 Delgado to Ponce, re: "Running of Payments"		
47A	Translation of Exhibit 47		
48	EMAIL 3/22/2010 Gireud to Ponce, copying Delgado, re: "CFE Adjusted Payment Schedule and effect on MPSA-FGG"		
49	LETTER 3/23/2010 Buendia to Delgado, re: Rescheduling of Payments, ST/019		
50	EMAIL 3/25/2010 Delgado to Adams, Gireud, and Miller, re: "Rescheduling of Payments"		
50A	Translation of Exhibit 50		
51	LETTER re: Payment to FGG from CFE		
52	EMAIL 3/26/2010 Delgado to Adams, Gireud, and Miller, re: "Wire Transfer Instructions and Brief Status Report"		
53	LETTER 3/30/2010 Buendia to Delgado, re: "Assignment of First Payment," ST/020		
53A	Translation of Exhibit 53		
54	EMAIL 4/1/2010 Beddard to Gireud, copying Delgado, re: "MPSA Invoice Payment"		
55	EMAIL 4/1/2010 Beddard to Gireud, copying Adams and Ponce, re: "MPSA Invoice Payment"		
56	EMAIL 4/3/2010 Pone to Gireud, re: "FGG"		
57	EMAIL 4/5/2010 Beddard to Gireud, re: "MPSA Invoice First Payment"		
58	EMAIL 4/5/2010 Gireud to Ponce, copying Delgado, re: "FGG"		
59	EMAIL 4/6/2010 Williams to Gireud, copying Delgado, re: "Urgent"		
60	EMAIL 4/6/2010 Gireud to Adams, "Assignment First Payment.pdf"		

Number	Exhibit	Admitted	Witness
60A	Translation of Exhibit 60		
61	EMAIL 4/7/2010 Adams to Gireud, re: "letter"		
62	EMAIL 4/12/2010 Delgado to Adams, re: "MPSA_FGG Payment Term Agreement"		
63	EMAIL 4/13/2010 Altamura to Delgado, re: "Agua Prieta - FGG - MPSA Subcontract"		
64	EMAIL 4/14/2010 Delgado to Altamura, re: "FGG-MPSA Subcontract"		
65	EMAIL 4/14/2010 Altamura to Delgado, re: "FGG-MPSA Subcontract"		
66	Revocation of Special Power of Attorney, by Gireud, 4/14/2010		
67	EMAIL 4/20/2010 Beddard to Gireud, re: "AGUA-FGG/Subcontract," with attachment "April Invoice 002.pdf"		
68	EMAIL 4/20/2010 Beddard to Gireud, re: "AGUA-FGG/Subcontract"		
69	EMAIL 4/23/2010 Altamura to Gireud and Miller, copying Delgado, re: "AGUA-FGG/Subcontract"		
70	EMAIL 4/23/2010 Altamura to Miller and Gireud, copying Delgado, re: "Amendment 1 to Subcontract between FGG and MPSA"		
71	EMAIL 4/23/2010, Gireud to Altamura, with attachment, "Amendment 1"		
72	Amendment No. 1 to Subcontract between FGG and MPSA, Apr. 23, 2010		
73	LETTER 5/7/2010 Gireud to Beddard, re: "Communication with CFE"		
74	EMAIL 5/8/2010 Beddard to Gireud, re: "Letter"		
75	EMAIL 5/10/2010 Gireud to Beddard, copying Delgado, re: "AGUA-FGG/Subcontract"		
76	EMAIL 5/10/2010 Beddard to Gireud, copying Delgado, re: "AGUA-FGG/Subcontract"		

Number	Exhibit	Admitted	Witness
77	LETTER 5/11/2010 Gireud to Laris (CFE), re: account		
77A	Translation of Exhibit 77		
78	EMAIL 5/13/2010 Beddard to Delgado, re: "RM: Balance 100% Agua Prieta"		
79	EMAIL 5/14/2010 Beddard to Delgado, re: "AGUA-FGG/Solar 12MWSteam Admission," with attachments		
80	EMAIL 5/14/2010 Beddard to Delgado, re: "Engineering & Construction Action Item List"		
81	EMAIL 5/16/2010 Beddard to Delgado, re: "Agua Prieta Engineering"		
82	EMAIL 5/18/2010 Beddard to Gireud, copying Delgado, re: "Invoice Submittal Notification"		
83	EMAIL 6/17/2010 Beddard to Gireud, copying Delgado, re: "AGUA-FGG/ Communications with CFE under Acquisition Contract"		
84	TRANSMISSION 7/6/2010, \$12 million transferred to Turks & Caicos Account (from MLAT)		
85	EMAIL 7/9/2010 Delgado to Narvaez, "Sending Project Contract"		
85A	Translation of Exhibit 85		
86	EMAIL 7/13/2010 Beddard to Gireud, copying Delgado, re: "AGUA-FGG/2nd Invoice Payment Reminder"		
87	LETTER 7/15/2010 Gireud to Delgado, re: 2nd CFE Payment Disbursements		
88	EMAIL 10/9/2010 Delgado to Beddard, re: "Postponement of CFE 10/13/10 Meeting"		
89	EMAIL 10/19/2010 Beddard to Gireud, copying Delgado, re: "AGUA-FGG/Notice of Breach of Contract"		
90	LETTER 10/26/2010 Buendia to Delgado, re: "Partial Retention of Second Payment," ST/026		

Number	Exhibit	Admitted	Witness
90A	Translation of Exhibit 90		
91	EMAIL 2/22/2011 Delgado to Gireud, copying Beddard		
92	EMAIL 2/24/2011 Beddard to Gireud, copying Delgado, re: "AGUA-FGG/Urgent Clarification of Equipment Title"		
93	EMAIL 2/24/2011 Altamura to Miller, copying Delgado, re: "AGUA-FGG/Urgent Clarification of Equipment Title"		
94	EMAIL 2/25/2011 Delgado to Gireud, re: "Borrador a kevin"		
95	EMAIL 2/28/2011 Delgado to Gireud, copying Miller, re: "For your review"		
96	EMAIL 2/28/2011 Miller to Beddard, copying Delgado, "Questions regarding Pledge"		
97	EMAIL 2/28/2011 Beddard to Miller, copying Delgado, re: "Questions regarding Pledge"		
98	EMAIL 3/1/2011 Delgado to Miller, re: "Questions regarding pledge"		
99	EMAIL 3/1/2011 Miller to Beddard, copying Delgado, re: "Questions regarding Pledge"		
100	EMAIL 3/1/2011 Beddard to Gireud, copying Delgado, re: "AGUA-FGG/Urgent Clarification of Equipment Title Rev 1"		
101	EMAIL 3/1/2011 Beddard to Gireud, copying Delgado, re: "AGUA-FGG/Urgent Clarification of Equipment Title Rev 1"		
102	EMAIL 3/6/2011 Beddard to Delgado, re: "J Adams Letter 28th Dec 2009," with attachment (12/28/2009 Adams Letter)		
103	EMAIL 3/7/2011 Delgado to Beddard, re: "J Adams Letter 28th Dec 2009"		
104	EMAIL 3/7/2011 Delgado to Beddard, re: "Assignment of Collection rights"		

Number	Exhibit	Admitted	Witness
105	EMAIL 3/10/2011 Burgueno to Delgado, copying Altamura, re: "Assignment of Collection Rights"		
106	EMAIL 3/17/2011 Beddard to Gireud, copying Delgado, re: "AGUA-FGG/Confidential Information Request"		
107	EMAIL 3/17/2011 Beddard to Gireud, copying Delgado, re: "AGUA-FGG/Pledge of Equipment"		
108	EMAIL 3/21/2011 Miller to Beddard, copying Delgado, re: "Pledge"		
109	EMAIL 3/24/2011 Beddard to Gireud, copying Delgado, re: "AGUA-FGG/Pledge of Equipment"		
110	EMAIL 3/24/2011 Delgado to Beddard, re: "AGUA-FGG/Pledge of the Equipment property of Mitsubishi Power Systems America"		
111	EMAIL 3/28/2011 Delgado to Beddard, re: "Confirmacion Prenda 03-05-11.doc"		
112	EMAIL 3/28/2011 Delgado to Beddard, re: "Signed Info Request"		
112A	Translation of Exhibit 112		
113	EMAIL 3/29/2011 Beddard to Gireud, copying Delgado, re: "AGUA-FGG/Pledge of the Equipment property of [MPSA]"		
114	EMAIL 3/30/2011 Delgado to Gireud, re: "AGUA-FGG/Breach of Contract"		
114A	Translation of Exhibit 114		
115	EMAIL 3/30/2011 Beddard to Miller, copying Delgado, re: "Collection Rights"		
116	EMAIL 3/30/2011 Miller to Altamura, copying Gireud, re: "FGG Collection Rights to MPSA"		
116A	Translation of Exhibit 116		
117	EMAIL 4/8/2011 Delgado to Beddard, re: "AGUA-FGG/Breach of Contract"		

Number	Exhibit	Admitted	Witness
118	EMAIL 4/8/2011 Delgado to Miller & Gireud, re: "AGUA-FGG/Confidential Information Request"		
119	EMAIL 4/8/2011 Miller to Delgado & Gireud, re: "Agua Prieta"		
120	EMAIL 4/8/2011 Delgado to Miller & Gireud, re: "Agua Prieta"		
121	EMAIL 4/10/2011 Delgado to Beddard, re: "AGUA-FGG/Confidential Information Request"		
122	EMAIL 4/10/2011 Altamura to Delgado, re: "AGUA-FGG/Breach of Contract"		
123	EMAIL 4/11/2011 Delgado to Altamura, re: "Collection Rights - Agua Prieta II"		
124	EMAIL 4/11/2011 Altamura to Delgado, re: "AGUA-FGG/Breach of Contract"		
125	EMAIL 4/12/2011 Delgado to Altamura, re: "FGG-MPSA Proposed meeting"		
126	EMAIL 4/15/2011 Delgado to Moreno (CFE), re: "Derechos de Cobranza Mitsubishi"		
126A	Translation of Exhibit 126		
127	EMAIL 4/15/2011 Morendo to Delgado, re: "Derechos de Cobranza Mitsubishi"		
127A	Translation of Exhibit 129		
128	EMAIL 7/1/2011 Delgado to Gireud, re: "LETTERS OF CREDIT"		
128A	Translation of Exhibit 128		
129	EMAIL 7/21/2011 Miller to Delgado & Gireud, re: "Transportation and impending disaster"		
130	EMAIL 8/1/2011 Gireud to Delagdo, re: "LTSA Status"		
131	EMAIL 10/11/2011 Delgado to Miller & Gireud, re: "Agua Prieta"		

Number	Exhibit	Admitted	Witness
132	EMAIL 11/9/2011 Delgado to Miller & Gireud, re: "Status of Contract"		
133	LETTER 3/1/2012 CFE to Gireud		
133A	Translation of Exhibit 133		
134	Text Messages between Gireud and Delgado, 1/13/2012 - 8/9/2012		
134A	Translation of Exhibit 134		
135	Power of Attorney by Gireud, 3/8/2012		
136	Form 1099 (Miscellaneous Income) from FGG to Delgado, for year 2010, \$820,000,		
137	Form 1099 (Miscellaneous Income) from FGG to Delgado, for year 2011, \$965,000		
138	Power of Attorney by Gireud, 6/10/2012		
139	Linda Medlock Emails		
140	EMAIL 6/3/2010 Delgado to Architect		
140A	Translation of Exhibit 140		
141	EMAIL 1/21/2011 Architect to Delgado, with attached invoice		
141A	Translation of Exhibit 141		
142	Standard Charter records re: wires		
143	Wells Fargo records re: wires		
144	Wells Fargo records for FGG's account		
145	Wells Fargo records for Linda Medlock's account		
146	Charlotte's Furniture records		
147	Rio Bravo Title records		
148	Rudolph Chevrolet records		

Number	Exhibit	Admitted	Witness
149	Land Rover of Albuquerque, NM records		
150	First New Mexico Title records (for Kandahar Condominium)		
151	Carnegie Mellon records		
152	Bowdoin College records		
153	Photos of Kandahar Apt. #19		
154	Photo of Jeep		
155	Photo of Range Rover		
156	Photo of Suburban		
157	Photos of 1109 Cerrito Feliz		
158	Wells Fargo records re: Transmission		

The Government opposes the admissibility of the documents indicated below based upon relevance and/or hearsay. The Government reserves its right to object to documents marked with an asterisk (*) subject to viewing the documents.

DEFENDANT'S PROPOSED EXHIBIT LIST

Exhibit No.	Description	Offered	Admitted	Gov't Objection?
1	Miranda Form			Yes
2	ROI 1			Yes
3	ROI 16			Yes
4	Consent to Search I-Phone			Yes
5	Cerrito Feliz Purchase Docs			
6	Charlotte's Docs			
7	Fedwire Docs			
8	Memorandum of Understanding-FGG			
9	Mack Massey			
10	Taos Condo Wires and info			
11	Linda Medlock Scans			
12	Mex Docs re Wire Trans and Rerouting			

	03/03/10			
13	Mits Correspondence 10/28/09			
14	Rudolph Docs			
15	Turks and Caicos- Rutley Affidavit, 01/28/13			
16	Email Re: First Caribbean Bank Docs from AUSA Arreola to Former Defense Counsel			Yes
17	First Caribbean Bank Documents 07/17/13			
18	Kandahar Condo Title History Citibank			
19	Carnegie Melon Response to Summons			
20	GECU			
21	Gireud Email, 07/01/11			
22	Land Rover Documents			
23	MVD Records			
24	Direct Buy Response to Summons			
25	Gireud Thumb Drive			
26	Mitsubishi Contract-SPANISH 01/24/12			
26a	Mitsubishi Contract- ENGLISH 01/24/12			
27	CFE Contract- Presentation and Openings of Proposals-SPANISH 10/20/09			*
27a	CFE Contract- Presentation and Openings of Proposals-ENGLISH 10/20/09			*
28	(Removed)			
29	FGG & National Bank of Foreign Trade Contract- SPANISH - 01/06/10			
29a	FGG & National Bank of Foreign Trade Contract- ENGLISH - 01/06/10			
30	FGG Correspondence Re: Wells Fargo Credit, 05/11/10			
31	First Caribbean, 03/03/10			
31a	First Caribbean, 03/03/10 ENGLISH			
32	Payment Due, 06/29/10			*
32a	Payment Due, 06/29/10 ENGLISH			*
33	Fiduciary Office, 03/07/12			*
33a	Fiduciary Office, 03/07/12 ENGLISH			*
34	FGG Economic Proposal-SPANISH			
34a	FGG Economic Proposal-ENGLISH			
35	Acta-Seals-Public Brokerage Services-SPANISH			
35a	Acta-Seals-Public Brokerage Services-ENGLISH			
36	CFE Sec 6 Contract			
37	Amendment 1-FGG & Mitsubishi 04/23/10			
38	CFE Correspondence Re: Financing 03/01/12			
39	FGG POWER OF ATTORNEY 03/08/12			
40	SPECIAL POWER OF ATTORNEY-MD			

	07/13/09			
41	FGG Business Entity Information			
42	Three Party Agreement for CFE Agua Prieta II and Book of Draft			Yes
43	CFE Correspondence Re: Contract 02/18/11			*
44	CFE Correspondence Re: Contract 03/24/11			
45	Amendment- SPANISH Re: CFE and FGG 04/22/11			*
45a	Amendment- ENGLISH Re: CFE and FGG 04/22/11			*
46	FGG Corres. Re: Financing Offer			*
47	(Removed)			
48	FGG Corres. Re: Receipt of Payment 07/15/09			
49	Email From MD to FJG Re: Breach of Contract 03/30/11			
50	Email from MD to Kevin Beddard Re: Confidential Info Request 03/17/11			
51	Email from FJG to MD Re: Sulzer Merged Agreement 04/15/11			Yes
52	Email from FJG to MD Re: Sulzer Merged Agreement ii 04/22/11			Yes
53	Email from FJG to MD Re: Assignment of Collections to MPSA 04/15/11			
54	Phone Texts Mobile: 915-929-1930, I-Phone: 915-667-1882 SPANISH			
54a	Phone Texts Mobile: 915-929-1930, I-Phone: 915-667-1882 ENGLISH			
55	Mitsubishi Corres. To FJG Re: Equipment Contract 01/12/10			
56	(Removed)			
57	Photo Taos Condo			
58	Photos of Jeep, Range Rover			
59	Photos of 1109 Cerrito Feliz- 09/27/13			
60	(Removed)			
61	Bank Records RE: FGG account			
62	Bank Records Re: IOLTA Account			
63	Bank Records Re: Marco Delgado Account			
64	Bank Records Re: PMA account			
65	Bank Records Re: Narvaez Accounts			
66	(Removed)			
67	ROI 12 02/16/12 Re: Meeting with SA and MD on 10/28/11			Yes
68	Bank Records from Standard Charter: Business Record Affidavit, 10/15/13			
69	Wells Fargo Records Acct 4733, 02/22/14			

70	Email Re: Revised Payment Plan 03/25/10			
71	Email Re: Formal Assignment Request 04/15/11			
72	Email Re: When to call 03/12/10			
73	Email Re: CFE Acknowledgement of Formal FGG Request 03/08/10			
74	Email Re: Format of Wire Transfer 03/26/10			
75	Email (03/25/10) Re: Color Doc Assignment and correspondence re: Payment to FGG from CFE(03/24/10)			
76	Email Re: JA Letter (02/11/10) and correspondence re: CFE-FGG Equipment Contract (01/30/10)			
77	Correspondence to MD from CFE 03/30/10			
78	Email (04/06/10) Re: CFE Letter and correspondence to MD from CFE (03/30/10)			*
79	Email Re: Agua-FGG Subcontract 05/10/10			
80	Email Re: FGG 04/04/10			
81	Email (03/03/10) Re: MPSAs Protests and correspondence from MPSA (03/03/10)			
82	Email Re: FGG Collection Right to MPSA 03/30/11 and executed Assignment of Collection Rights			
83	Email Re: CFE Assignment 03/11/10			
84	Email Re: FGG-MPSA (04/07/10) and FGG Correspondence Re Payment to MPSA (04/06/10)			
85	Fideicomiso De Administracion			*
86	Business Record Affidavit and attachments- Wells Fargo 10/17/13			
87	MPSA Lawsuit v. FGGM FG, and MD-2012 and Attachments			Yes
88	Wells Fargo Correspondence Re: Subpoena 11/07/13			
89	Sulzer v. FGG Original Petition			Yes
90	Email (06/09/11) Tania Mendez Re: CFE Documents and Executed Amendment of Collection (06/09/11)			Yes
91	FGG Correspondence to Sulzer (Pardivala) 03/08/11			Yes
92	FGG Amendment to Service Contract 06/10/12			Yes
93	FGG Authorization, 06/09/11			Yes
94	Power of Attorney FGG, 06/10/12			
95	Fed Ex Documents			*
96	(Removed)			

97	Order Granting Selzer Motion to Compel, 03/17/13,			Yes
98	Miller First Supp Responses to RFP, 06/17/13			Yes
99	(Removed)			
100	Email Re: Agua Prieta Project 01/05/10			
101	Email (01/12/10) Re: FGG Clarifications Letter and FGG Correspondence (01/12/10)			
102	Email Re: Itinerary 01/12/10			
103	Email Re: Agua Prieta II 02/07/11			
104	Email Re: FGG TSUSH Letter of Intent Draft 02/17/11			Yes
105	Email Re: Contract for Services 02/17/011			
106	Email Re: FGG-FEB-11 02/21/11			
107	Email Re: AGUA-FGG Urgent Clarification of Equipment Title, 02/24/11			
108	Email Re: Borrador a Kevin 02/25/11			
109	Email Re: Review of Letter to Kevin 02/28/11			
110	Email Re: Questions Regarding Pledge 02/28/11			
111	Email Re: AGUA-FGG 2 nd Delay Notice 03/11/11			
112	Email Re: Agua Prieta 04/08/11			
113	Email Re: AGUA-FGG Breach of Contract: Request for Authorization for the Assignment of collection rights 04/10/11			
114	Email Re: agreement Agua Prieta 05/08/09			*
115	Email Re: MX-311N Answers to Questions 05/30/11			*
116	Email Re: Collection of Rights			
117	(Removed)			
118	Exclusivity and Non-Circumvention Agreement Thomassen Amcot-FGG			
119	CFE Correspondence 05/18/11			*
120	FGG Correspondence Re: Payment 03/22/10			
121	Revocation of Special Power of Attorney – FJG 04/14/10			
122	FGG Correspondence Re: Wells Fargo 05/11/10			
123	FGG Correspondence Re: 2 nd CFE Payment Disbursements- Agua Prieta II 07/15/10			
124	FGG Correspondence 03/22/10			
125	Addendum to Teaming Agreement FGG and Mitsubishi 08/11/09			
126	FGG Correspondence 12/10/09			*
127	FGG Correspondence Re: Confidentiality			*

	Agreement 07/14/09			
128	Email Re: Meeting 03/29/11			*
129	FGG Correspondence Re: Agua Prieta II-Various, 11/11/10			*
130	CFE Correspondence CFE to Mits. 08/26/11			*
131	Email Re: Collection Rights 03/30/11			
132	Email Re: Obtaining Counsel, 04/08/11			
133	Email Re: Transportation and Disaster			
134	FGG Correspondence Re: Contract 03/28/11			
135	CFE Correspondence 10/26/10			
136	CFE Correspondence 03/03/10			
137	FGG 2010 Tax Return			
138	FGG 2010 CORRECTED Tax Return			
139	Email to Altamura from Kevin Beddard 3/28/11 with FGG Correspondence 03/28/11			
139a	Email to Altamura from Kevin Beddard 3/28/11 with FGG Correspondence 03/28/11			
140	Linda Medlock emails			
141	John Adams Passport			
142	John Adams Border Crossing			
143	MLAT Docs			
144	Apostile Mits Power Sys			*
145	Bancomext -SPANISH			
145a	Bancomext ENGLISH			
146	Annexos A-V FGG Ent Inc.			
147	Documents provided by Rene Ordonez Atty for Mace Miller			
148	Notary Book 1- Arais Davila			
149	Notary Book 2- Arais Davila			
150	Credit Card Transactions Provided by Linda Medlock			
151	FGG Ent LLC Provided by F. Gireud			
152	Emails Provided by F. Gireud			*
153	1099's Provided by F. Gireud			
154	Def FJG Responses			Yes
155	Def FJG Supp Response to RFP			Yes
156	Mace Miller Object and Res to RFP re: Venue			Yes
157	Sulzer Docs Re Responses to RFP 10/31/12			Yes
158	Correspondence From Haynes & Boone			Yes
159	Correspondence dated 11/29/11 to Linda Medlock from Steve James RE: IRS			Yes
160	Correspondence and draft to Marco Delgado from Linda Medlock w/IRS Docs 11/10/11			
161	Correspondence to Linda Medlock, 07/05/11 from Susan Urieta, Atty RE: Child Support			Yes

	and additional child support documents			
162	(Removed)			
163	(Removed)			
164	(Removed)			
165	Documents from Bowdoin College			
166	Subcontracto de Adquisicion de Bienes y Anexos			
167	Documents 16 MPSA0000001-16MPSA0000129- Travel Documents			
168	FGG Pledge Docs			
169	Ponce Email with Annexo S and Chart			
170	16MPSA0000547 to 16MPSA0000581-John Adams Cell Records from Dec 2009 to Jan 2010			
171	CFE AUDIT			Yes
172	Discovery Letter- Gov't with Proffer Letters			Yes
173	“Contrato De Adquisiciones” with Official Stamps			
174	1.ROI'S <i>Brady/Giglio</i> Source			Yes
175	Corres Skipplings Rutley, 03/23/10			
176	Checks to Mace Miller and Gireud, 05/20/09			
177	Check Linda Medlock, 04/19/10;			
178	Checks to Joe Montes, Liliana Narvaez, Ray Velarde, Chris Parker, 2012;			Yes
179	(Removed)			
180	(Removed)			
181	(Removed)			
182	(Removed)			
183	Order for Issuance of Witness Subpoena <i>Ad Testificandum and Duces Tecum</i> for Mitsubishi Power Systems Americas, Inc.'s Custodian of Records, March 4, 2016			Yes
184	Order for Issuance of Witness Subpoena <i>Ad Testificandum and Duces Tecum</i> for Fernando Gireud, March 4, 2016			Yes
185	Mitsubishi/CFE Agreement October 2013			Yes

Dated: May 16, 2016

Respectfully submitted,

RICHARD L. DURBIN, JR.
UNITED STATES ATTORNEY

By: _____ /s/

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Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on May 16, 2016, a true and correct copy of the foregoing instrument was electronically filed with the Clerk of the Court using the CM/ECF System, which will send notice to counsel of record.

/s/
Debra P. Kanof
Assistant United States Attorney